

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MARIA MANOSALVES and
CARLOS MANOSALVES,

Plaintiffs,

-against-

FUJITSU TRANSACTION SOLUTIONS, INC.

Defendant.

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07 Civ. 3846

**PLAINTIFF'S
FIRST SET OF
INTERROGATORIES**

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PLAINTIFFS FIRST SET OF INTERROGATORIES DIRECTED TO DEFENDANT,
FUJITSU TRANSACTION SOLUTIONS, INC.

Plaintiffs Maria Manosalves and Carlos Manosalves, by their attorneys, Baker, Leshko, Saline & Blosser, LLP, hereby requests that defendant Fujitsu Transaction Solutions, Inc. respond to the following interrogatories in accordance with the Federal Rules of Civil Procedure:

1. Please state:
 - (a) The name and address of the person or persons answering these interrogatories;
2. Are you aware of any statements made by plaintiff (or its employees) regarding the occurrence mentioned in the complaint, whether oral, written,

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or recorded in any way, including but not limited to, a stenographic, mechanical, electrical, audio, video, motion picture, photograph, or other recording, or transcript thereof, and if so, please attach an exact copy of the original of said statement, interview, report, film or tape to your answers to these interrogatories; if oral, please state verbatim the contents thereof.

3. Photographs:

State whether there exists photographs, videotapes or movies with respect to the occurrence mentioned in the petition. If so, state the following:

- (a) Describe each photograph, video, or movie;
- (b) State the date each was take;
- (c) State the name and address of the person taking each such photo, video, or movie; and,
- (d) State the name and address, employer, insurer, and job title of the person presently having control or custody of each photograph, video or movie.

4. Experts:

List and identity:

- (a) Each person this defendant expects to call as an expert witness at the trial, whether the witness is a retained expert or non-retained expert, stating for each such expert:
 - (i) Name;
 - (ii) Address;
 - (iii) Occupation;
 - (iv) Place of employment;
 - (v) Qualifications to give an opinion (if such information is available on an expert's curriculum vitae, you may attach a copy thereof in lieu of answering this interrogatory subpart); and,
- (b) With respect to each expert listed, please state the subject matter on which the expert is expected to testify and the expert's hourly deposition fee.

5. Witnesses:

State the names and addresses of every person known by defendant, defendant's representatives or defendant's attorneys, to have witnessed the occurrence mentioned in the petition, or who was present at the scene

within sixty minutes of the occurrence. Designate which of such people actually claim to have witnessed the occurrence.

6. Insurance:

State whether or not any insurance company (including any company with excess or umbrella coverage) has an interest in the outcome of this litigation against defendant. If so, state the following:

- (a) The name of the insurance company;
- (b) Whether the insurance company is a stock company or a mutual company ;
- (c) Name of the insured;
- (d) Type(s) of insurance;
- (e) Effective policy period;
- (f) Policy number;
- (g) Limits of the policy applicable to the occurrence mentioned in these pleadings; and,
- (h) Whether the policy provides for medical payments coverage, and if so, the amount of coverage.

Dated: White Plains, New York
November 2, 2007

BAKER LESHKO SALINE & BLOSSER LLP
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